

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**JESSICA JONES, et al.,**

Plaintiffs,

v.

**VARSITY BRANDS, LLC, et al.**

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

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**INDIRECT PURCHASER PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO  
FILE A MEMORANDUM OF LAW WITH EXCESS PAGES AND REQUEST FOR  
EXTENSION OF TIME TO FILE**

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MEMORANDUM OF LAW WITH EXCESS PAGES AND REQUEST FOR EXTENSION OF TIME TO  
FILE**

Indirect Purchaser Plaintiffs Jessica Jones, Cristina Lorenzen, and Amy Coulson (“Plaintiffs”), by and through the undersigned class counsel, hereby move this Court under Local Rule 7.2(e) for leave to file a memorandum of law with up to five excess pages in support of their Motion For An Award Of Attorneys’ Fees, For Reimbursement Of Expenses, And For Service Awards For The Class Representatives. In addition, Plaintiffs respectfully request leave to file the motion one day later on Tuesday, September 3, 2024, because the deadline specified in the Court’s preliminary approval order, ECF No. 612, happens to fall on Labor Day. Defendants do not oppose the requests.

In their forthcoming motion for approval of fees and costs, Plaintiffs must show that the amount of attorneys’ fees requested is fair and reasonable, that the expenses incurred by Class Counsel were reasonably necessary to advance the litigation on behalf of the Settlement Classes, and that the Class Representatives are deserving of the requested service awards. While Plaintiffs will make every effort to be as concise as possible, in order to fully detail the extensive work performed by Class Counsel and the Class Representatives over three years, Plaintiffs seek five additional pages in excess of the 20 pages permitted under Local Rule 7.2(e). On July 5, 2023, the Court granted a similar motion brought by the *Fusion Elite* Plaintiffs prior to their motion for fees and costs. *See Fusion Elite All Stars, et al. v. Varsity Brands, LLC, et al.*, No. 2:20-CV-2600-SHL-tmp (W.D. Tenn.), ECF No. 341 (granting leave for five additional pages).

In addition, on June 18, 2024, in its order granting preliminary approval, the Court ordered that Plaintiffs file their motion for fees and costs by September 2, 2024. *See* ECF No. 612. September 2 happens to fall on Labor Day. Plaintiffs thus respectfully request leave to file their motion for fees and costs one day after the Labor Day holiday, on Tuesday, September 3, 2024. Plaintiffs’ counsel wish not to labor, nor entice the Court or others to labor, on the upcoming holiday.

Dated: August 28, 2024

Respectfully submitted,

s/ David H. Seidel

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Joseph R. Saveri\*  
Ronnie Seidel Spiegel\*+  
David Seidel\*  
Kevin E. Rayhill\*  
Elissa A. Buchanan\*  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1505  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
jsaveri@saverilawfirm.com  
rspiegel@saverilawfirm.com  
dseidel@saverilawfirm.com  
krayhill@saverilawfirm.com  
eabuchanan@saverilawfirm.com

Van Turner Jr. (TN Bar No. 22603)  
**TURNER FEILD, PLLC**  
2650 Thousand Oaks Blvd., Suite 2325  
Memphis, Tennessee 38118  
Telephone: (901) 290-6610  
Facsimile: (901) 290-6611  
VTurner@TurnerFeildLaw.com

Richard M. Paul III\*  
Ashlea Schwarz\*  
**PAUL LLP**  
601 Walnut, Suite 300  
Kansas City, Missouri 64106  
Telephone: (816) 984-8100  
rick@paulllp.com  
ashlea@paulllp.com

Jason S. Hartley\*  
**HARTLEY LLP**  
101 West Broadway, Suite 820  
San Diego, CA 92101  
Telephone: (619) 400-5822  
hartley@hartleyllp.com

Daniel E. Gustafson\*  
Daniel C. Hedlund\*  
Daniel J. Nordin\*  
**GUSTAFSON GLUEK PLLC**  
Canadian Pacific Plaza  
120 South Sixth Street, Suite 2600  
Minneapolis, MN 55402  
Telephone: (612) 333-8844  
Facsimile: (612) 339-6622  
dgustafson@gustafsongluek.com  
dhedlund@gustafsongluek.com  
dnordin@gustafsongluek.com

\* Admitted *pro hac vice*  
+ Located in Washington State

*Attorneys for Plaintiffs*

**CERTIFICATE OF CONSULTATION**

I hereby certify, pursuant to Local Rule 7.2(a)(1)(B), that on August 28, 2024, I consulted with all counsel for Defendants, advising them that Plaintiffs intended to file a motion seeking the relief set out above and asking if they opposed. The following counsel confirmed that Defendants do not oppose the requested relief:

- Steven Kaiser for the Varsity Defendants
- Nicole Riccio for Defendant U.S. All Star Federation
- Brendan P. Gaffney for Defendant Jeff Webb
- Christopher Tayback for Bain Defendants
- Lucy Baeurle for Charlesbank Defendants

/s/ David H. Seidel

David H. Seidel